

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MARIA STOCKING,

22 CV 07347 (ER)

Plaintiff,

-against-

NEWMARK KNIGHT FRANK

VALUATION & ADVISORY, LLC,

Defendants.

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PLAINTIFF’S MOTION TO PROHIBIT CONTACT BY FORMER ATTORNEYS

In light of Plaintiff’s filing of the Motion to Vacate and Motion to Appoint Special Master and Independent Counsel, supported by the Declaration of Maria Stocking that details allegations of legal bullying to influence judicial outcomes in favor of Newmark, Plaintiff respectfully requests that the Court issue an order prohibiting former attorneys Peter Hoogerwoerd, Cole, Scott & Kissane’s Andrew Simon, and John Cody German as well as current attorney Stewart Karlin, from contacting Plaintiff directly or indirectly. Any further contact from these individuals poses a serious threat to Plaintiff’s well-being and undermines the integrity of the legal process.

Although Peter Hoogerwoerd, Andrew Simon, and John Cody German have not contacted Plaintiff since the case was transferred to the Southern District of New York, Plaintiff believes they may attempt to do so in response to the Declaration of Maria Stocking submitted in support of the recently filed motions.

In light of Plaintiff's petition for the appointment of a Special Master and the assignment of Independent Counsel, Plaintiff also seeks the Court's guidance on how to manage her ongoing relationship with New York attorney Stewart Karlin.

To protect Plaintiff's well-being and to ensure the legal process remains free from undue influence, Plaintiff requests that this Court issue an order prohibiting these attorneys from any form of contact. Given their past conduct, particularly the allegations of legal bullying and collusion, any further communication from them would exacerbate Plaintiff's distress.

Plaintiff respectfully requests that the Court grant this motion and issue an order:

1. Prohibiting Peter Hoogerwoerd, Andrew Simon, John Cody German, and Stewart Karlin from contacting Plaintiff directly or indirectly.
2. Providing guidance on how Plaintiff should handle relationship with New York attorney Stewart Karlin..

For the reasons outlined above, Plaintiff respectfully asks the Court to grant this motion in full to protect her well-being and ensure the fairness and integrity of the ongoing legal proceedings.

Respectfully submitted,

Dated: August 15, 2024

/s/Maria Stocking

Miami, Florida

Maria Stocking

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Plaintiff

